

Accountability and Oversight

RACE TO THE TOP FISCAL ACCOUNTABILITY AND OVERSIGHT REVIEW

Rhode Island

Date of Review: April 1-5, 2013

Race to the Top award: \$75,000,000.00

Acronyms:

ARRA – American Recovery and Reinvestment Act of 2009

EDGAR – Education Department General Administrative Regulations (codified in 34 Code of Federal Regulations, Parts 74 to 86 and 87 to 99)

GEPA – General Education Provisions Act

ISU – Implementation and Support Unit

LEA – Local Educational Agency

RIDE – Rhode Island Department of Education

Summary of Monitoring Indicators

Rhode Island				
Critical Element	Requirement	Citation	Results	Page
Allocations to LEAs	The State allocated funds to participating LEAs based on their relative share of funding under Title I, Part A of the Elementary and Secondary Education Act of 1965.	ARRA Section 14003(a)	Met Requirement	
Fiscal Oversight of Race to the Top Funds	The State and sub-recipients used the funds only for allowable activities.	ARRA Sections 14002(b), 14003, 14004, 1604, 1605, and 1606	Met Requirement	
	The State and sub-recipients complied with the principles of cash management (i.e. funds advanced were actually expended).	EDGAR § 80.21	Met Requirement	
	The State and sub-recipients have systems to track and account for Race to the Top funds in place.	EDGAR § 80.20	Met Requirement	
	The State and sub-recipients complied with cross-cutting ARRA requirements (e.g., Section 1512 reporting, Buy American, infrastructure certification).	ARRA Sections 1511, 1512, 1604, 1605, 1606, and 1607	Met Requirement	
	The State and sub-recipients used the funds only during the period of availability (which may include pre-award costs).	ARRA Section 1603 and GEPA 421(b)	Met Requirement	
1511 Certifications (if applicable)	The State certifies that infrastructure investments have received the full review and vetting required by law and accepts responsibility that it is an appropriate use of taxpayer dollars.	ARRA Section 1511	Met Requirement	
Quarterly ARRA Reporting	The State is ensuring compliance with ARRA Section 1512 quarterly reporting regulations.	ARRA Section 1512	Met Requirement	
	The State established clear policies and procedures for compliance with applicable reporting requirements.	ARRA Sections 14008 and 1512	Met Requirement	
	The State provided guidance on reporting to LEAs.	ARRA Sections 14008 and 1512	Met Requirement	
	The State provided feedback to LEAs on the data reported.	ARRA Sections 14008 and 1512	Met Requirement	

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Critical Element	Requirement	Citation	Results	Page
Sub-recipient Monitoring	The State has developed a monitoring plan with appropriate policies and procedures to assure compliance with applicable Federal requirements and that the grant performance goals are being achieved throughout the project period.	EDGAR §80.40; Race to the Top grant condition “O”	Met Requirement	
	The State has developed comprehensive monitoring protocols that include programmatic and fiscal monitoring.	EDGAR §80.40; Race to the Top grant condition “O”	Issues Resolved	4
	The State has established a reasonable monitoring schedule.	EDGAR §80.40; Race to the Top grant condition “O”	Issues Resolved	4
	The State has provided monitoring reports and corrective action follow-up (when available).	EDGAR §80.40; Race to the Top grant condition “O”	Met Requirement	

Monitoring Report Results

Issues Resolved

Critical Element: Sub-recipient monitoring

Requirement and Citation: The State has developed comprehensive monitoring protocols that include programmatic and fiscal monitoring. EDGAR §80.40; Race to the Top grant condition “O.”

Issue: The State submitted its Race to the Top sub-recipient monitoring plan in July 2011. In that plan the State indicated it planned to conduct an annual self-assessment survey regarding Race to the Top implementation and supports received. Sub-recipients would have 60 business days to complete it. Within 90 days of receiving the self-assessment, RIDE auditors planned to use this survey information to inform a risk assessment and determine which sub-recipients should be monitored. Within 60 days of an on-site or desk review, the State would submit a draft report to the sub-recipient. Sub-recipients would then have 15 business days to review the draft and provide edits. At the time of the Year 2 on-site review, RIDE described how most LEAs had not yet requested reimbursement of Race to the Top funds and that they were working closely with LEAs during summer 2012 to amend LEA Race to the Top budgets. Under the circumstances, the State did not conduct the self-assessment survey in Year 2 or the subsequent fiscal monitoring activities. The State has not yet initiated the fiscal monitoring process with sub-recipients. The Department acknowledges that the State has developed and implemented a sub-recipient monitoring process for Race to the Top programmatic monitoring.

Resolution: In response to the Required Action issued in the Monitoring Report, the State submitted to the Department the materials for fiscal monitoring of sub-recipients (LEAs) including the self-assessment survey and a description of the monitoring protocols used during the on-site or desk review. The State also submitted its plan for reporting findings to LEAs after it conducts on-site or desk reviews.

Critical Element: Sub-recipient monitoring

Requirement and Citation: The State has established a reasonable monitoring schedule. EDGAR §80.40; Race to the Top grant condition “O.”

Issue: The State has not conducted the fiscal monitoring aspect of the State’s sub-recipient monitoring plan. In the State’s sub-recipient monitoring plan the State described the process above for selecting sub-recipients for fiscal monitoring and conducting on-site or desk reviews. At the time of the Year 3 on-site review the State indicated that it planned to conduct fiscal monitoring but that it had not yet done so.

Resolution: In response to the Required Action in the Monitoring Report, the State submitted to the Department a sub-recipient monitoring schedule from fiscal year 2013 through fiscal year 2015.